

## CSM Legal, P.C.

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### VIA ECF

Hon. Sarah L. Cave  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Plaintiffs' requested extension (ECF No. 93) is GRANTED. By **May 2, 2022**, Plaintiffs shall file a motion for default judgment as to Defendants Royal, Rym, Singh, Aangan, and Doe in accordance with the Individual Practices of the Honorable Katherine Polk Failla, Fed. R. Civ. P. 55, and S.D.N.Y. Local Rule 55.

The Clerk of Court is respectfully directed to close ECF No. 93.

SO ORDERED 4/14/2022

  
SARAH L. CAVE  
United States Magistrate Judge

Re: *Maldonado Rosete et al. v. Aangan of India LLC et al.*  
Case No. 1:20-cv-09598-SLC

Your Honor:

This office represents Plaintiffs in the above-referenced matter. We respectfully request additional time to file a Motion for Default Judgment as to Defendants Royal, Rym, Singh, Aangan, and Doe.

Per the Court's Order dated March 30, 2022 (ECF Dkt No. 89), Plaintiffs were ordered to 1) by April 1, 2022, request a certificate of default as to Doe from the Clerk of Court; and 2) By April 15, 2022, file a Motion for Default Judgment as to Royal, Rym, Singh, Aangan, and Doe. As of April 1, 2022, Plaintiffs have filed their request for a certificate of default as to Doe, which was then certified by the Clerk Ruby J. Krajick and filed on April 4, 2022.

Plaintiffs are now respectfully requesting additional time to file a Motion for Default Judgment as to Defendants Royal, Rym, Singh, Aangan, and Doe. The new attorney handling this case, Frank Palermo, has been sick with COVID and hasn't had enough time to familiarize himself with the facts of this action. Plaintiffs propose a filing deadline of May 2, 2022 for Plaintiffs' Motion for Default Judgment. This is Plaintiffs' first request for an extension of time to file a Motion for Default.

The Plaintiffs thank the Court for its continued time and attention to this matter.

Respectfully submitted,

/s/ Catalina Sojo  
Catalina Sojo, Esq.  
CSM Legal, P.C.  
*Attorneys for Plaintiffs*

cc: K.S. Aluwalia, Esq. (via ECF)  
*Attorney for Defendants*